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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware  
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF PAUL  
VANDERSLICE IN SUPPORT OF  
OMNIBUS MOTION TO SEAL  
MATERIALS SUBMITTED IN  
CONNECTION WITH SUMMARY  
JUDGMENT AND *DAUBERT* BRIEFING  
IN THE ADVERTISER CASE**

Judge: Hon. James Donato

1 I, Paul Vanderslice, declare as follows:

2 1. I am an attorney at the law firm Wilmer Cutler Pickering Hale and Dorr LLP. I  
3 represent Defendant Meta Platforms, Inc. in the above-captioned action. I submit this declaration  
4 in support of the Omnibus Motion to Seal Materials Submitted in Connection with the Summary  
5 Judgment and *Daubert* Briefing in the Advertiser case (“Sealing Motion”). I have personal  
6 knowledge of the facts or circumstances set forth herein. If called upon as a witness in this action,  
7 I could and would testify competently thereto.

8 2. As discussed in detail in the Declaration of Amrish Acharya, Meta asserts that there  
9 are compelling reasons and good cause to seal certain of its information included in the summary  
10 judgment and *Daubert* briefing.

11 3. As part of the process for preparing the Sealing Motion, Meta and Advertiser  
12 Plaintiffs notified non-parties whose confidential information had been included in the summary  
13 judgment and *Daubert* briefing and provided those non-parties an opportunity to submit a  
14 declaration in connection with this Motion as it relates to their information.

15 4. With respect to Advertiser Plaintiffs’ expert reports filed in connection with the  
16 parties’ summary judgment and *Daubert* briefing, because Advertisers Plaintiffs filed the entirety  
17 of their experts’ reports in connection with Advertiser Plaintiffs’ opposition to Meta’s motion for  
18 summary judgment—as compared to Meta, which filed limited excerpts of Advertiser Plaintiffs’  
19 reports—to reduce the burden on non-parties from reviewing duplicative materials, Advertisers  
20 Plaintiffs agreed to contact non-parties regarding the non-party information contained in  
21 Advertisers’ expert reports. To the extent a non-party seeks to seal a portion of Advertiser  
22 Plaintiffs’ full expert reports, Meta has included a corresponding sealing request as to any excerpts  
23 of such reports filed by Meta where applicable.

24 5. Pursuant to the non-party notification process described above, the following non-  
25 parties submitted declarations in connection with the Sealing Motion, true and correct copies of  
26 which are attached herewith as:

27 a. **Exhibit A1:** Declaration of Samantha Birkenfeld-Malpass (X Corp.)

b. **Exhibit A2:** Declaration of Brett Celedonia (Netflix, Inc.)

c. **Exhibit A3:** Declaration of Alok Verma (Google LLC)

d. **Exhibit A4:** Declaration of Catherine Spevak (Apple Inc.)

6. Advertiser Plaintiffs informed Meta on March 10, 2025 that they take no position on any non-party sealing requests, and requested that Meta share its sealing requests. Meta provided Advertiser Plaintiffs with its proposed sealing requests, and Advertiser Plaintiffs informed Meta that they would not oppose the sealing of Meta employee email addresses, but opposed the remainder of Meta's requests.

7. Additionally, true and correct copies of the documents subject to sealing requests in the Sealing Motion are attached as exhibits to this declaration as set out below. These exhibits reflect the sealing positions of Meta (orange highlighting), and non-parties (green highlighting).<sup>1</sup>

Exhibit	Document	Docket Number
Exhibit B1	Defendant Meta Platforms, Inc.'s Notice of Motion and Motion For Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint	874-1
Exhibit B2	Defendant Meta Platforms, Inc.'s Notice of Motion and Motion For Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint, Exhibit 1, Excerpts of Expert Merits Report of Michael A. Williams, Ph.D., dated Aug. 5, 2024	874-2
Exhibit B3	Defendant Meta Platforms, Inc.'s Notice of Motion and Motion For Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint, Exhibit 5, Excerpts of Transcript of Deposition of Tilman Klumpp, held on Mar. 5, 2024	874-6
Exhibit B4	Defendant Meta Platforms, Inc.'s Notice of Motion and Motion For Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint, Exhibit 6, Excerpts of Expert Merits Report of Tilman Klumpp, Ph.D., dated Jan. 12, 2024	874-7

<sup>1</sup> Some exhibits contain yellow highlighting, as that highlighting existed in the as-filed document. Yellow highlighting does not indicate a sealing request.

1	Exhibit B5	Defendant Meta Platforms, Inc.'s Notice of Motion and Motion For Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint, Exhibit 10, Excerpts of Transcript of Deposition of Markus Jakobsson, held on Feb. 22, 2024	874-11
2	Exhibit C1	Defendant Meta Platforms, Inc.'s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Michael Willaims, Exhibit 1, Excerpts of Expert Merits Report of Michael A. Williams, Ph.D., dated Aug. 5, 2024	876-2
3	Exhibit C2	Defendant Meta Platforms, Inc.'s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Michael Willaims, Exhibit 4, Excerpts of Transcript of Deposition of Scott Fasser, held on Sept. 7, 2023	876-5
4	Exhibit D1	Defendant Meta Platforms, Inc.'s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Tilman Klumpp, Exhibit 1, Excerpts of Expert Merits Report of Tilman Klumpp, Ph.D., dated Jan. 12, 2024	878-2
5	Exhibit D2	Defendant Meta Platforms, Inc.'s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Tilman Klumpp, Exhibit 2, Excerpts of Transcript of Deposition of Tilman Klumpp, held on Mar. 5, 2024	878-3
6	Exhibit E1	Defendant Meta Platforms, Inc.'s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Markus Jakobsson, Exhibit 1, Excerpts of Expert Merits Report of Markus Jakobsson, Ph.D., dated Jan. 12, 2024	880-2
7	Exhibit E2	Defendant Meta Platforms, Inc.'s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Markus Jakobsson, Exhibit 2, Excerpts of Expert Merits Report of Markus Jakobsson, Ph.D., dated Feb. 9, 2024	880-3
8	Exhibit E3	Defendant Meta Platforms, Inc.'s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Markus Jakobsson, Exhibit 3, Excerpts of Advertiser Plaintiffs' Responses and Objections to Meta Platforms, Inc.'s Fifth Set of Interrogatories to Advertiser Plaintiffs	880-4
9	Exhibit F	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion to Exclude Expert Testimony and Opinions of Markus Jakobsson	886-1
10	Exhibit G	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion to Exclude Testimony of Dr. Tilman Klumpp	888-1
11	Exhibit H1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment	892-1

1	Exhibit H2	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 1, Expert Merits Report of Michael A. Williams, dated Aug. 5, 2024	892-3
2			
3	Exhibit H3	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 2, Expert Report of Michael A. Williams, Ph.D., May 24, 2024	892-3
4			
5	Exhibit H4	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 3, Expert Reply Report of Michael A. Williams, Ph.D., dated July 8, 2024	892-3
6			
7	Exhibit H5	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 4, Expert Merits Report of Tilman Klumpp, Ph.D., dated Jan. 12, 2024	892-5
8			
9	Exhibit H6	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 5, Expert Rebuttal Report of Tilman Klumpp, Ph.D., Feb. 9, 2024	892-5
10			
11	Exhibit H7	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 6, Expert Merits Report of Markus Jakobsson, Ph.D., dated Jan. 12, 2024	892-7
12			
13	Exhibit H8	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 7, Rebuttal Expert Merits Report of Markus Jakobsson, Ph.D., Feb. 9, 2024	892-7
14			
15	Exhibit H9	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 10	892-9
16			
17	Exhibit H10	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 11	892-9
18			
19	Exhibit H11	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 13, PX-2857 Priell Deposition	892-9
20			
21	Exhibit H12	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 14, PX-414 Olivan Deposition	892-9
22			
23	Exhibit H13	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 15, PX-2256 Zuckerberg Deposition	892-9
24			
25	Exhibit H14	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 16	892-9
26			
27	Exhibit H15	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 18, PX-2255 Zuckerberg Deposition	892-9
28			

1	Exhibit H16	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 19, PX-2984 Zervas Deposition	892-9
2	Exhibit H17	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 20, PX-2861 Priell Deposition	892-9
3	Exhibit H18	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 21	892-10
4	Exhibit H19	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 24, PX-557 Schultz Deposition	892-10
5	Exhibit H20	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 26	892-10
6	Exhibit H21	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 28	892-10
7	Exhibit H22	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 29, PX-116 Parikh Deposition	892-10
8	Exhibit H23	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 32, PX-2215 Naveh Deposition	892-10
9	Exhibit H24	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 34 PX-1747 Wei Deposition	892-10
10	Exhibit H25	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 36	892-10
11	Exhibit H26	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 40	892-10
12	Exhibit H27	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 41	892-11
13	Exhibit H28	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 42	892-11
14	Exhibit H29	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 43	892-11
15	Exhibit H30	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 44	892-11
16	Exhibit H31	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 45	892-11
17	Exhibit H32	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 46	892-11
18	Exhibit H33	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 47	892-11



1	Exhibit H34	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 48	892-11
2	Exhibit H35	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 49	892-11
3	Exhibit H36	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 50	892-11
4	Exhibit H37	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 51	892-11
5	Exhibit H38	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 52	892-11
6	Exhibit H39	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 53	892-11
7	Exhibit H40	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 54	892-11
8	Exhibit H41	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 55	892-11
9	Exhibit H42	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 56	892-11
10	Exhibit H43	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 57	892-11
11	Exhibit H44	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 58	892-11
12	Exhibit H45	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 59	892-11
13	Exhibit H46	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 61 PX-1322 Chang Deposition	892-12
14	Exhibit H47	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 63	892-12
15	Exhibit H48	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 64	892-12
16	Exhibit H49	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 65	892-12
17	Exhibit H50	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 67	892-12
18	Exhibit H51	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 68	892-12
19	Exhibit H52	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 70 PX-1295 Jakubowski Deposition	892-12

1	Exhibit H53	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 71	892-12
2	Exhibit H54	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 72, PX-1711	892-12
3		Crum Deposition	
4	Exhibit H55	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 73, PX-1712	892-12
5		Crum Deposition	
6	Exhibit H56	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 74, PX-1922	892-12
7		Sandberg Deposition	
8	Exhibit H57	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 75, PX-1921	892-12
9		Sandberg Deposition	
10	Exhibit H58	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 81	892-13
11	Exhibit H59	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 83	892-13
12			
13	Exhibit H60	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 92	892-13
14	Exhibit H61	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 93	892-13
15			
16	Exhibit H62	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 94	892-13
17	Exhibit H63	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 95, PX-412	892-13
18		Olivan Deposition	
19	Exhibit H64	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 96, PX-1926	892-13
20		Sandberg Deposition	
21	Exhibit H65	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 97	892-13
22	Exhibit H66	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 99	892-13
23			
24	Exhibit H67	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 100, PX-119	892-13
25		Parikh Deposition	
26	Exhibit H68	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 105	892-14



Exhibit I1	Defendant Meta Platforms, Inc.'s Reply in Support of Motion to Exclude Expert Testimony and Opinions of Tilman Klumpp, Exhibit 3, Excerpts of Expert Merits Report of Tilman Klumpp, Ph.D., dated Jan. 12, 2024	901-2
Exhibit I2	Defendant Meta Platforms, Inc.'s Reply in Support of Motion to Exclude Expert Testimony and Opinions of Tilman Klumpp, Exhibit 4, Excerpts of Transcript of Deposition of Tilman Klumpp, held on Mar. 5, 2024	901-3
Exhibit J1	Defendant Meta Platforms, Inc.'s Reply in Support of Motion for Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint, Exhibit 12, Excerpts of Expert Merits Report of Michael A. Williams, Ph.D., dated Aug. 5, 2024	903-2
Exhibit J2	Defendant Meta Platforms, Inc.'s Reply in Support of Motion for Summary Judgment Regarding First Amended Consolidated Advertiser Class Action Complaint, Exhibit 15, Excerpts of Transcript of Deposition of Tilman Klumpp, held on Mar. 5, 2024	903-5

I declare that the foregoing is true and correct under penalty of perjury.

Executed on this 14th day of March, 2025, in New York, New York.

By: /s/ Paul Vanderslice  
Paul Vanderslice